

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

RUTH SMITH, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

Case No.

1:22-cv-00081-LMB-

vs.

WEF

SUNPATH, LTD., a Massachusetts  
corporation,

Defendant.

\_\_\_\_\_ /

DEPOSITION OF  
RULE 30(b)(6) DEPOSITION OF CHUKRAN MANAGEMENT GROUP  
d/b/a AMERICAN PROTECTION CORP. ("AMERICAN PROTECTION")  
KOBI CHUKRAN

(Conducted Via Videoconference)

DATE: November 1, 2022

TIME: 11:03 a.m. to 2:06 p.m.

PURSUANT TO: Notice by counsel for Plaintiff  
for purposes of discovery, use at  
trial or such other purposes as  
are permitted under the Federal  
Rules of Civil Procedure

REPORTED BY: Aaron T. Perkins, RMR, CRR, CRC  
Notary Public, State of  
Florida at Large

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1 maybe \$10, \$15. It depends on the particular  
2 time.

3 Q. Okay. But they would receive the \$200  
4 if the sale was made. Do I understand that  
5 correctly?

6 A. No. This is in this particular example.  
7 Now, please, I would like to entered into the  
8 record that we've never done any business with  
9 Capital Buddies, LLC. Okay? This is a sales  
10 party that expressed interest in the affiliate  
11 program. I provided it as a sample as per the  
12 subpoena's request. But there was no relationship  
13 between us. And this is a sample agreement.

14 Q. So the amount could change?

15 A. Absolutely.

16 Q. Okay.

17 A. Absolutely.

18 Q. Does American Protection keep track of  
19 which affiliates are associated with which sales?

20 A. We do our best to, yes.

21 Q. Do you know if there's any affiliate  
22 associated with the solicitations to plaintiff?

23 A. There was none.

24 Q. None?

25 A. There was none. It was strictly that

1 she received a postcard from us, and she called in  
2 to request information.

3 Q. Okay. Previously we discussed  
4 agreements with the subcontractors.

5 Do you recall that?

6 A. Yes.

7 Q. I was under the impression this related  
8 to subcontractors, but you informed me it does  
9 not.

10 Does American Protection have agreements  
11 with the subcontractors that it utilized during  
12 the relevant time period?

13 A. We have agreements with subcontractors.

14 Q. Are they written?

15 A. Yes.

16 Q. Could they be produced?

17 A. For this particular time frame, I would  
18 have to search and determine that.

19 Q. Okay.

20 A. Again, we do our best efforts to  
21 maintain those records. I'm a small, one man type  
22 of company. I do my best. But, unfortunately,  
23 sometimes we have hard drives that have crashed on  
24 me, and some records were lost in the process,  
25 yes.